

## EXHIBIT D

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

HIS ALL HOLINESS, BARTHOLOMEW I,  
THE ARCHBISHOP OF  
CONSTANTINOPLE, NEW ROME, AND  
ECUMENICAL PATRIARCH; THE HOLY  
METROPOLIS OF DRAMA; AND THE  
MONASTERY OF THEOTOKOS  
EIKOSIPHONISSA,

Plaintiffs,

vs.

PRINCETON UNIVERSITY,

Defendant.

Case No. 3:18-cv-17195-MAS-DEA

The Hon. Judge Michael A. Shipp, U.S.D.J.

The Hon. Judge Zahid N. Quraishi, U.S.M.J.

**PLAINTIFF THE HOLY METROPOLIS  
OF DRAMA’S RESPONSES AND  
OBJECTIONS TO DEFENDANT’S FIRST  
SET OF INTERROGATORIES**

Plaintiff the Holy Metropolis of Drama (“Plaintiff,” or the “Monastery”), through its attorneys and pursuant to Rule 33 of the Federal Rules of Civil Procedure, responds and objects to Defendant Princeton University’s (“Defendant”<sup>1</sup>) First Set of Interrogatories to Plaintiff, the Holy Metropolis of Drama (the “Interrogatories”) as follows:

**GENERAL OBJECTIONS AND LIMITATIONS**

1. Plaintiff continues to investigate and analyze the facts relating to this case and has not completed discovery. The responses and objections set forth herein are based on information currently known to Plaintiff. While the information set forth herein is true and correct to Plaintiff’s best knowledge as of this date, Plaintiff provides these responses and objections without prejudice to its right to correct, amend, or supplement them.

---

1. Defendant has indicated that its proper designation is The Trustees of Princeton University.

- The Patriarch (alive), whose efforts, throughout his term as Archbishop of Constantinople, New Rome, and Ecumenical Patriarch from 1991 to present, include, without limitation, encouraging the efforts of Metropolitans Dionysios and Pavlos and various representatives of the Greek government to locate and recover the manuscripts stolen from the Monastery in 1917, including the Manuscripts.
- Plaintiffs' counsel and consulting experts, whose efforts, beginning in 2012, include, without limitation, carrying out an investigation seeking to locate and recover the manuscripts stolen from the Monastery in 1917, including the Manuscripts.
- The various Sisters and Monks of the Monastery, whose efforts include, without limitation, praying regularly and ardently for the return of the manuscripts stolen from the Monastery in 1917, including the Manuscripts, ever since their theft.

Pursuant to Local Rule 33.1(c), as to the information requested in this Interrogatory, documents exist and oral communications took place.

**INTERROGATORY NO. 2.**

Identify how, when, where, and by whom, following their alleged unlawful taking on March 27, 1917, you first discovered the identity of the possessor(s) and the whereabouts of each Manuscript.

**RESPONSE:**

In addition to the General Objections and Limitations set forth above, Plaintiff objects to this Interrogatory insofar as it seeks information protected from discovery by the attorney-client privilege and the work product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds that in or around March 2013 the current Metropolitan of Drama first discovered the identity of the possessor and the whereabouts of each Manuscript through Plaintiff's counsel, Hughes Hubbard & Reed

LLP, which Plaintiff retained to help locate and recover the manuscripts stolen from the Monastery in March 1917, including the Manuscripts.

Plaintiff further responds that in September 2019, Plaintiff learned of the existence of a book, published in 1995 and attributed to the late former Metropolitan of Drama Dionysios, that appears to state that Garrett MS. 14 and Garrett MS. 16 are in the Library of Princeton University. Plaintiff is in the process of investigating the significance of this and will amend this Response if and as appropriate.

Pursuant to Local Rule 33.1(c), as to the information requested in this Interrogatory, documents exist and oral communications likely took place.

**INTERROGATORY NO. 3.**

Identify how, when, where, and by whom, following their alleged unlawful taking on March 27, 1917, you first discovered that Defendant possessed each Manuscript.

**RESPONSE:**

In addition to the General Objections and Limitations set forth above, Plaintiff objects to this Interrogatory insofar as it seeks information protected from discovery by the attorney-client privilege and the work product doctrine.

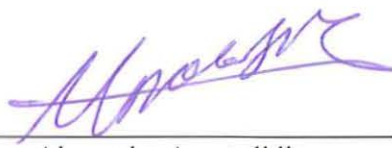
Subject to and without waiving the foregoing objections, Plaintiff responds that in or around March 2013 the current Metropolitan of Drama first discovered that Defendant possessed each Manuscript through Plaintiff's counsel, Hughes Hubbard & Reed LLP, which Plaintiff retained to help locate and recover the manuscripts stolen from the Monastery in March 1917, including the Manuscripts.

Plaintiff further responds that in September 2019, Plaintiff learned of the existence of a book, published in 1995 and attributed to the late former Metropolitan of Drama Dionysios, that appears to state that Garrett MS. 14 and Garrett MS. 16 are in the Library of Princeton

**CERTIFICATION**

I, Alexander Apostolidis (Metropolitan Pavlos), hereby certify that that I am the Metropolitan of Plaintiff the Holy Metropolis of Drama ("Plaintiff" or the "Metropolis"), and I am authorized to submit this certification on behalf of Plaintiff. I do not believe that one person at the Metropolis knows all of the matters stated herein and, therefore, Plaintiff the Holy Metropolis of Drama's Objections and Responses to Defendant's First Set of Interrogatories ("Plaintiff's Interrogatory Objections and Responses") was prepared with the assistance of and advice of representatives of, and counsel for, Plaintiff, on whose assistance and advice I have also relied. I have read Plaintiff's Interrogatory Objections and Responses, and I certify, under penalty of perjury, that the foregoing are true and correct to the best of my knowledge and belief, based upon my own knowledge and the information supplied to me.

Dated: October 17/2019

  
\_\_\_\_\_  
Alexander Apostolidis